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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

NATIONAL URBAN LEAGUE, *et al.*,

Case No. 5:20-cv-05799-LHK

Plaintiff,

**DEFENDANTS' RESPONSE TO THE
COURT'S SEPTEMBER 19, 2020 ORDER,
ECF No. 165**

WILBUR L. ROSS, JR., *et al.*,

Defendants.

1 Pursuant to the Court's Order dated September 19, 2020, ECF No. 165, Defendants
2 respectfully state as follows:

3 In response to paragraph 1 of the Order, Defendants state that they have already produced
4 and filed all documents in their September 18, 2020 privilege log at ECF No. 154-2 that do not
5 have a privilege identified under the column for "Privilege."

6 In response to paragraph 2 of the Order, Defendants provide the following information

7 For the September 13, 2020 production:

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- 9 • Documents produced: 139
 - 10 • Documents withheld in full on the basis of an asserted privilege: 67
 - 11 • Documents partially redacted on the basis of an asserted privilege: 14

12 For the September 18, 2020 production:

- 13
- 14 • Documents produced: 1,658
 - 15 • Documents withheld in full on the basis of an asserted privilege: 433
 - 16 • Documents partially redacted on the basis of an asserted privilege: 568

17 In response to paragraph 4 of the Order, Defendants have made available to the reviewing
18 judges via FTP the document production at ECF Nos. 154-157.

19 Defendants further state in response to paragraph 3 that they are investigating the extent to
20 which they can perform the specified modifications to the privilege log within the prescribed time
21 period.
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23 DATED: September 19, 2020

24 Respectfully submitted,

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27 JEFFREY BOSSERT CLARK
28 Acting Assistant Attorney General

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/s/ M. Andrew Zee
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Attorneys for Defendants

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the 19th day of September, 2020, I electronically transmitted the
3 foregoing document to the Clerk of Court using the ECF System for filing.

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5 */s/ M. Andrew Zee* _____
6 M. ANDREW ZEE

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